

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,
Plaintiff

v.

ANDREA CABRAL, SUFFOLK
COUNTY SHERIFF'S DEPARTMENT,
SUFFOLK COUNTY, and
CORRECTIONAL MEDICAL
SERVICES, INC.
Defendants

Civil Action No. 04-11935-DPW

AFFIDAVIT OF STAN WOJTKONSKI

I, Stan Wojtkonski being duly sworn do hereby depose and state,

1. My name is Stan Wojtkonski and I am an Investigator for the Sheriff's Investigation Division ("SID") of the Suffolk County Sheriff's Department.
2. I have been employed as an Investigator with SID for approximately four years.
3. On May 21, 2003 I had a conversation with FBI Special Agent Christa Snyder outside the Nashua Street Jail.
4. During this conversation, Agent Snyder informed me that a member of the medical staff at the HOC, whom Snyder did not identify, had contacted her on the evening of May 20, 2003. Agent Snyder said this person told her that they had witnessed an examination of Inmate Rosario on May 19, 2003 conducted by a person named "Beth". Agent Snyder said this person told her that they had witnessed bruising to Inmate Rosario's neck, chest and arms that they did not feel was consistent with self-inflicted wounds.
5. Agent Snyder asked to be kept updated on the status of the Rosario investigation.

6. On May 23, 2003 Agent Snyder called me to inquire about the status of SID's investigation into Inmate Rosario's allegations.

7. I informed her that two SID investigators had been working on the case for the past several days and had interviewed Inmate Rosario and taken photographs of his injuries on May 22, 2003. I informed Agent Snyder that investigators had not found the injuries that had been reported to her by her confidential source.

8. I informed Agent Snyder that no member of the nursing staff had submitted reports to SID concerning injuries that had been incurred by Inmate Rosario.

9. I assured Agent Snyder that no staff member would be hindered from speaking with an outside law enforcement agency, but the staff member still had an obligation to report incidents directly to the SCSD and SID.

10. Agent Snyder assured me that if the confidential source contacted her again she would advise it to report the incident directly to the Department.

Signed under the pains and penalties of perjury this 14th day of October, 2005.

/s/ Stan Wojtkonski
Stan Wojtkonski